Montana Department of Environmental Quality

WASTE MANAGEMENT SECTION

Newsletter

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Working Faces

Forever Changing

Andrea Vickory
Water Quality Specialist, Temporary Editor

In case you are not aware, I have changed positions at DEQ and am now working in the Public Water Supply Section. Farewell to you and good luck and wishes to the new Inspector as they come aboard. This issue of the Newsletter contains very interesting information and two handouts that are for your use. The C & D helpful handout is a great guideline and I hope you think so too.

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Construction & Demolition Waste Management

Group IV Waste

George Scriba
Solid and Hazardous Waste Specialist

Segregation of the construction and demolition (C & D) waste stream (Group IV Wastes) into Class IV landfills and discrete landfill sections is increasing as a management strategy at solid waste management facilities. With this trend, identifying and understanding the components of the C & D waste stream may become valuable tools in employing effective C & D waste segregation. The potential value may be found in a diverse range of programs, including hazardous waste screening, and permitted salvaging and recycling.

C & D waste can be generally categorized by its generation source and/or its components. Common sources of C & D waste include:

- Site Clearance
- Excavation
- Roadwork
- Renovation, Remodeling, and Repair
- Demolition
- Disaster Debris

The typical components of the C & D waste stream include:

- Wood
- Drywall
- Metals
- Plastics
- Roofing
- Rubble
- Bricks
- Glass
- Miscellaneous Materials

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C & D Waste *continued from page 1*

By understanding the source and components of C & D waste, the operator may be more prepared to identify potentially problematic, as well as salvageable and/or recyclable materials typically present in a particular waste stream during disposal.

Included in this newsletter you will find a double-sided "Construction & Demolition Debris" handout. The handout is designed to identify acceptable Class IV landfill wastes, detail the general sources and components of the C & D waste stream, and provide information on potentially problematic wastes. Acceptable materials listed are by no means all inclusive, and other information may be modified as our understanding of C & D landfills increase in the future. Your questions, comments and/or concerns would be welcomed and appreciated. I can be reached at (406) 444-1434 or gscriba@state.mt.us.

Junk Vehicle Program News

We'll Pay You

Darrell Stankey
Junk Vehicle Program Manager

It was interesting to note that according to the newspaper I just browsed earlier this morning that we are in a "Severe Drought". Already. This early in the year! Still! HMMM! Sounds just like what we've been experiencing in the scrap metal markets! For over four years now.

It used to be that the income we made from selling the junk vehicles amounted to about 28% of our total Program revenue. Not so any more. Now it's down to about 9% (if we're lucky). Not to worry, though.

Because of funding changes made by the last Legislature, we have sufficient revenue to keep the Program solvent and your grants coming.

But the depressed scrap metals market has had another impact, especially on the local junk vehicle programs, - a significant increase in the requests for your junk vehicle removal service! As a result there are a number of counties that have completely exhausted their funding and are unable to haul again until July. And it's not just the junk vehicle programs that are getting more hauling calls. So are the hired Abandoned Vehicle removers.

As many of you are aware, we will pay the hired hauling charge ($70.00 flat rate) incurred by a law enforcement agency when they have an abandoned vehicle removed. What you may not be aware of are the requirements that must be met for us to be able to make those payments.

First, it must be an abandoned vehicle. Second, the vehicle must be hauled at the request of a law enforcement agency. Third, a non-governmental (hired) hauler must do the hauling. Fourth, a special form must be completed and sent to this office. And fifth, there must be a Company billing document with the special form. You probably know about these elements already.

What you may not have picked up on is that we also need the Federal Tax ID for those hauling businesses (or County Sheriff's Departments) to which we make the reimbursements. This is because at the end of the calendar year the Department has to send each one of these businesses a statement of how much money was paid to them over the course of the year. This is for tax purposes, of course. So this becomes a sixth requirement that we have to have to be able to pay those reimbursement claims.

So if you get asked about the abandoned vehicle reimbursement portion of our Program, you now have the "facts, just the facts, and nothing but the facts (to paraphrase a bit)".

The Treated Wood Industry

And Its Controversial Outlaw

Michele Fitcher
Solid and Hazardous Waste Specialist

Chromated Copper Arsenate (CCA) was introduced in the 1960's as a wood preservative for untreated wood. The application of CCA protects the wood, making it more durable. Because of its appealing qualities, CCA-treated wood has been used to build walkways, picnic tables, playground structures, decks and for landscaping. However, if scientific experts conclude that this type of treated wood places human health and the environment at high risk, then it may soon be outlawed.

Recent published results of scientific studies are suggesting that arsenic, over time, slowly leaches from CCA-treated wood products. Several factors, that can affect the amount and rate at which arsenic leaches, include: the geographical location of the CCA-treated wood; local climate; acidity of rain and soil; the age of the wood product; and the application rate of CCA to the wood. For that reason, humid regions may be at a greater risk than arid regions.

Some studies suggest applying oil-based or semi-transparent stains to reduce the migration of wood preservative chemicals from CCA-treated wood. Latex semitransparent, latex opaque, and oil-based opaque stains, however, on outdoor surfaces (decks and fences) are not recommended, because peeling and flaking may have an impact on durability as well as exposure to the preservatives in the wood.

Because arsenic is toxic and a known human carcinogen, the Environmental Protection Agency (EPA) has been communicating with experts to determine risk assessment. On February 12, 2002, EPA announced a voluntary decision by industry to move consumer use of treated lumber products away from a variety of pressure-treated wood that contains arsenic by December 31, 2003, in favor of new alternative wood preservatives. In addition, CCA will no longer be available to treat wood intended for decks, picnic tables, landscaping timbers, gazebos, residential fencing, patios, walkways/boardwalks, and play-structures. Although EPA does not recommend that consumers replace or remove existing structures made with CCA-treated wood nor the soil surrounding these structures, they do suggest that concerned individuals may want to take extra precautions. If you are currently working with CCA-treated wood, EPA offers the following safety guidelines:

- Saw, sand, and machine CCA-treated wood outdoors. (*Granted, this probably wasn't written with Montana's winter weather in mind, but try to follow this guideline if possible*.) Protect yourself by wearing a dust mask, goggles and gloves.
- Dispose of sawdust, scraps, and other construction debris in municipal solid waste. *Don't* dispose of it in yard waste. (*Composting or mulching sawdust or remnants from CCA-treated wood could create the potential for arsenic to leach into the soil or contaminate the compost)*
- *Don't* burn CCA-treated wood, as toxic chemicals may be released as part of the smoke and ashes.
- After working with the wood, wash all exposed areas of your body, especially the hands, thoroughly with soap and water before eating, drinking, toileting, or using tobacco products. Wash work clothes separately from other household clothing before wearing them again.

With rising environmental concerns, Montana's Solid Waste Management Program (SWMP) will continue monitoring scientific studies regarding CCA-treated wood. The SWMP will also follow the development of EPA's risk assessment. For disposal of treated wood in Montana, treated wood is a Group IV waste that can be disposed of at either a Class IV or Class II landfill, both of which have groundwater monitoring systems. Class III landfills are licensed to accept *untreated* wood only. For more information on CCA-treated wood, please visit EPA's website at http://www.epa.gov/pesticides/citizens/cca_transition.htm.

Handling and Disposal of Infectious Waste

Information You Need To Know

Mike DaSilva
Solid Waste Licensing Program Manager

The law covering infectious waste is appropriately named the Infectious Waste Management Act. For those of you who are in need of stimulating reading material, the Act may be found at Section 75-10-1001, et seq., Montana Code Annotated. The sole purpose of the Act and any rules adopted to implement the Act is to protect human health.

Based on the definitions in the law, almost all of the waste generated from the testing or treatment of patients in hospitals, clinics, medical labs and doctor's offices is considered infectious waste. Any facility that generates, treats, transports, stores or disposes of infectious waste must comply with the provisions of the Act.

Infectious wastes must be separated from other waste at the source. They must be stored, transported and disposed of in containers marked with the biohazard warning. Infectious wastes, other than sharps must be contained in closed, moisture-proof plastic bags that will not tear or burst under normal conditions of handling and use.

Sharps, which are any items or implements that are capable of puncturing or cutting human skin, must be stored, transported and disposed of in leak-proof, rigid, puncture resistant containers that stay closed. All infectious wastes must arrive at the treatment facility with the containers intact and lids securely in place.

Prior to final disposal, the infectious wastes must be rendered sterile by chemical, or steam sterilization, incineration, or other Department approved techniques, such as microwave sterilization. Liquid or semi-solid infectious wastes, after having been chemically sterilized, may be disposed of in municipal sanitary sewers that convey wastes to a secondary treatment plant.

All infectious waste containers that have been autoclaved must be marked with heat-sensitive tape or labels so that it is visually apparent that the wastes have been sterilized. If chemical or other sterilization techniques have been used the containers must be labeled appropriately.

Refrigerant Recovery Verification

Record Form

George Scriba
Solid and Hazardous Waste Specialist

The "Stratospheric Ozone Protection Refrigerant Disposal Verification Form", developed by the U.S. Environmental Protection Agency (EPA), is designed to serve as a protective measure for facilities that manage the disposal of refrigerant appliances.

Although not required by the regulations, it is recommended as a recordkeeping tool for the tracking and documentation of refrigerant recovery at the solid waste management facility. When accepting appliances that previously contained refrigerant, it is required to have the person from whom the appliance was obtained verify that the refrigerant has been evacuated. Verification requirements are detailed in fine print at the bottom of the form, which include name, address, date of recovery, and a signed statement that all the refrigerant had not leaked and has been recovered.

Facilities that perform refrigerant removal/recovery on site are recommended to use the form for tracking and documenting appliances serviced and disabled, unless a facility has a preferred system that provides the same function. It is critical in all cases to document specific identification or serial number of serviced appliances, and to keep complete records for all appliances on site. Following these recommendations will protect the facility from potential liabilities associated with the release of ozone-depleting substances into the atmosphere.

For further inquiries regarding proper handling of refrigerants and/or associated appliances, or to obtain an electronic version of this form, please feel free to contact me at (406) 444-1434 or gscriba@state.mt.us. You can also contact Betsy Wahl of the Helena EPA office at (406) 457-5013 or bwahl@epa.gov

New Recycling Listserve Initiated

Lets Get Connected

Sandra Boggs
Recycling and Marketing Development Specialist, Pollution Prevention Bureau, DEQ

You are invited to join a listserve named **WasteP2**, which is hosted by the Pollution Prevention Bureau of the Department of Environmental Quality.

Have you ever wondered how the Town of Broadus organized such a successful volunteer-run recycling program? Would you like to receive information on funding available through diverse grant programs? What do other towns do to promote Household Hazardous Waste days? How do they cover the costs? What materials are other communities able to recycle? Are towns near you interested in jointly marketing recyclables?

The purpose of the Waste Pollution Prevention listserve is to connect the many volunteers and professionals actively engaged in waste management, recycling, and pollution prevention in Montana. This listserve will help volunteers and professionals share questions, answers, success stories, and partnership opportunities. A lot of good work is being done in Montana to reduce the amount of material going into our landfills. This work is completed by solid waste professionals and by many volunteers working in small communities and accomplishing a great deal with limited resources.

By participating in this listserve, you will enhance source reduction and recycling efforts across Montana by establishing a network of resources and adding to a wealth of shared knowledge.

The new WasteP2 listserve will provide a structured opportunity to share ideas and exchange success stories with others across the state. To subscribe, send an email message to: join-wastep2@lists.state.mt.us. For more information, please contact Sandra Boggs, Recycling and Marketing Development Specialist, Pollution Prevention Bureau, 406-444-9897 or sboggs@state.mt.us.

Landfill Technologies Alternative Final Covers

Interstate Technology Regulatory Council

Rick Thompson
Solid Waste Section Supervisor

Landfill covers have traditionally been designed to prevent infiltration of moisture into and percolation through the landfill, i.e., a moisture barrier. This convention has been prescribed in regulation through permeability criteria designed into the construction of the landfill. Landfill performance is prescribed in regulation only in relation to the material parameter of the infiltration barrier of the traditional barrier cover. Evapotranspiration covers are designed to allow infiltration of moisture into the cover soil materials and subsequent transpiration by a final cover, thus controlling the flux of water into the underlying waste or contaminated material. The principle obstacles to the use and acceptance of these alternative designs are:

(1) lack of field-scale performance data for prescriptive or alternative designs,
(2) difficulties associated with the current regulatory requirement to demonstrate equivalency to the material parameter-based traditional cover design, and
(3) inability to fully utilize the flexibility in the various governing regulations.

The Air Force Center for Environmental Excellence funded the Interstate Technology Regulatory Council (ITRC) to design, organize and further support a meeting to formulate a discussion among the most prominent researchers in the field and the state and federal regulatory agencies representing ITRC. This occurred on September 11, 2001, in Austin, TX. As a result, a new (ITRC) team was formed to collect, compile, evaluate and report on the three primary design, construction, and operational areas referred to as Alternative Landfill Technologies (ALT). The documents, when utilized, will streamline the acceptance and deployment of these technologies. To further inform the users, the team will evaluate training options appropriate to the market and material.

Rick Thompson of the Solid Waste Program recently became a member of this member to the team, as there is a great interest in the state solid community to find less costly alternatives for landfill final covers. Below is the timetable for the ALF. If you have any question on the ITRC and the progress of the ALF team, please contact Rick.

see schedule on page 6

Alternative Final Covers

Phase	Description	Schedule
I	Consolidate team	CF-2001
II	Case study Collection & Analysis	1/2002-6/2002
III	Tech & Reg. Guidance, Internet Training Prep & Test	7/2002 -12/2002
IV	Internet Training delivery (8 courses)	7/2003 - 2004
V	Classroom Training Delivery (2 classes)	7/2003 - 2004

LICENSING REVIEW SEQUENCE

1. Pre-submission discussions with applicant.

2. Application or submittal Received.

3.(a) Within 15 day of receiving application, County Health Officer will be notified by DEQ – a copy will be sent to the applicant.
(b)Review by DEQ within 60 days of receipt of the application or submittal.

4. Within the next 15 days:
-Informal discussion of inadequacies with applicant,
-Draft Notice of Deficiency (NOD) prepared and,
-NOD finalized by DEQ and sent to applicant.

5.Meeting to discuss NOD with applicant – optional at the discretion of the applicant.

6. Response to NOD by applicant – within 90 days 17.50.513(1) ARM

7. Within 15 days of receipt of the NOD response -- review and respond to any incomplete or inadequate items. Return to step 7 if necessary.

8. Preparation of draft EA by DEQ or approval or denial of submittal – 30 days.

9. Finalization of EA – Commence 30-day public comment period.

10. Public meeting – optional.

11. Review of public comments by DEQ – Within 15 days – Department will:
-Review comments,
-Request additional information from applicant as needed,
-Develop mitigation or permit conditions,
-Discuss these with applicant and,
-Finalize response and send to applicant and commentors.

12. Decision by DEQ to license or not license the facility (or to recommend an EIS, which would put application on hold).

13. Notify County Health Officer of DEQ decision to license facility.

14. Within 15 days of DEQ decision to license, County Health Officer accepts or rejects DEQ decision.

15. If County Health Officer rejects licensure decision, Appeal to Board of Environmental Review – 30 days.

16. License granted or denied.

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